

Message

From: COLLINS Jay [Jay.COLLINS@state.or.us]
Sent: 1/23/2019 10:51:59 PM
To: [Ex. 6 PP / Ex. 7(C)]
Subject: FW: Former SoloPower Facility - Status of Removal of Hazardous Substances and Clean Harbors - Provided Analytical Data

From: COLLINS Jay <Jay.COLLINS@state.or.us>
Sent: Friday, January 18, 2019 5:39 PM
To: [Ex. 6 PP / Ex. 7(C)] COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: BATES Zebuliah <Zebuliah.Bates@state.or.us> [Ex. 6 PP / Ex. 7(C)]
[Ex. 6 PP / Ex. 7(C)]
Subject: RE: Former SoloPower Facility - Status of Removal of Hazardous Substances and Clean Harbors - Provided Analytical Data

Thank you, [Ex. 6 PP / Ex. 7(C)]

Regarding the used Evoqua filters, should I understand now that those filters are properly characterized and will go out under hazardous waste manifest (with LDR)? I counted 32 of these filters removed from machines, so that effort has proceeded as part of site operations. I anticipate receiving these records in due course.

Thank you for the recent manifests, LDR forms, and waste characterization analytical data. The codes match up with the analytical findings.

Regarding the waste characterization documentation, I also request the field HAZMAT characterization records performed by your personnel and/or CHES personnel at LIT's behest.

DEQ is pleased to see this important project moving toward final resolution. I want to thank you, Tetra Tech, [Ex. 6 PP / Ex. 7(C)] LIT, and all parties committing time, effort, and funding to correct the problematic situation left by the former lease holder.

Jay

From: [Ex. 6 PP / Ex. 7(C)]
Sent: Thursday, January 17, 2019 5:54 PM
To: COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: BATES Zebuliah <Zebuliah.Bates@state.or.us> [Ex. 6 PP / Ex. 7(C)]
[Ex. 6 PP / Ex. 7(C)]
Subject: RE: Former SoloPower Facility - Status of Removal of Hazardous Substances and Clean Harbors - Provided Analytical Data

Jay:
Status of Hazardous Substances Removal: Clean Harbors, Inc. (CHES) expects to remove tomorrow (Friday) the last of the hazardous substances you saw today in the wastewater acid neutralization (WWAN) room and the rags that were being used to reclean localized areas of the plating equipment in the adjacent plating room. [Ex. 6 PP / Ex. 7(C)] whom you met will prepare a weekly hazardous substances inspection form tomorrow, once the removal activities are completed. No hazardous substances are expected to be removed next week.

Evoqua Water Technologies LLC (Evoqua) has told CHES that they expect to return to the Site the week of January 28th to remove their equipment-attached cylinders from the WWAN room. We understand that that removal will be under manifest. We will provide copies of the manifest(s) when provided to us by Evoqua.

Attached please find waste profile-related analytical reports and a profile for TSP provided to us to date by CHES.

Please let me know if you need any additional information for the hazardous substances removed to date.

Regards, Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C)

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From: COLLINS Jay <Jay.COLLINS@state.or.us>
Sent: Thursday, January 17, 2019 9:44 AM
To: Ex. 6 PP / Ex. 7(C)
Cc: COLLINS Jay <Jay.COLLINS@state.or.us>; BATES Zebuliah <Zebuliah.Bates@state.or.us>
Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Manifests & LDRs for 7 Jan 2019

Thank you for these records, Ex. 6 PP / Ex. 7(C)

I had the inspection forms. If hazardous waste activity moves into next week, I will need one more for that week.

Hopefully, Clean Harbors is providing the facility the generator copy of all hazardous waste manifests and LDRs for its record.

Jay

From: Ex. 6 PP / Ex. 7(C)
Sent: Wednesday, January 16, 2019 5:00 PM
To: COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: Ex. 6 PP / Ex. 7(C)
Ex. 6 PP / Ex. 7(C) BATES Zebuliah <Zebuliah.Bates@state.or.us>
Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Manifests & LDRs for 7 Jan 2019

Jay: I will check with Clean Harbors to locate manifest ending in 750, and any remaining manifests post 8 January 2019. The following are the last manifests we currently have an electronic copy of in our files.

08 January 2019: 4 manifests ending in: 749 & 751-753

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Wednesday, January 16, 2019 4:46 PM

To: 'COLLINS Jay' <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) 'BATES Zebuliah' <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Manifests & LDRs for 7 Jan 2019

This is the first of two e-mails with manifests and LDRs received since those provided in the e-mail in the chain below.

07 January 2019: 5 manifests ending in: 741 to 743, 745, & 748

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Wednesday, January 9, 2019 5:01 AM

To: COLLINS Jay <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) BATES Zebuliah <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update - Re-Send in Individual E-mails - 4th E-mail for 4 Jan 2019

Jay: 04 January 2019: 7 manifests ending in: 732 to 738
manifests/LDRs

This is the last e-mail with

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Wednesday, January 9, 2019 5:00 AM

To: 'COLLINS Jay' <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) 'BATES Zebuliah' <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update - Re-Send in Individual E-mails - 3rd E-mail for 3 Jan 2019

Jay: 03 January 2019: 5 manifests ending in: 726 to 730

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Wednesday, January 9, 2019 4:53 AM

To: 'COLLINS Jay' <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) 'BATES Zebuliah' <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update - Re-Send in Individual E-mails - 2nd E-mail for 2 Jan 2019

Jay: 02 January 2019: 7 manifests ending in: 817, 819, 820, 823 to 825, & 827

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Wednesday, January 9, 2019 4:38 AM

To: 'COLLINS Jay' <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) 'BATES Zebuliah' <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update - Re-Send in Individual E-mails - E-mail for 31 Dec 2018

Jay: The e-mail below apparently wasn't delivered due to its 15 mB size. I am re-sending it in five e-mails with each day's documents in individual e-mails and one e-mail with the waste profile analytical reports.

31 December 2018: 4 manifests ending in: 805 to 807, & 812

Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C)

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From: Ex. 6 PP / Ex. 7(C)

Sent: Tuesday, January 8, 2019 6:36 PM

To: COLLINS Jay <Jay.COLLINS@state.or.us>

Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C) BATES Zebuliah <Zebuliah.Bates@state.or.us>

Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update

Jay: Attached, please find the first sets of manifests, land disposal restriction (LDR) notification forms, and waste profile analytical reports that Tetra Tech has received from Clean Harbors, Inc. (CHES).

To facilitate review by the Oregon Dept. of Env. Quality (ODEQ) the manifest/LDR attachments are organized according to the date that the hazardous substances were removed from the Site:

31 December 2018:	4 manifests ending in:	805 to 807, & 812
02 January 2019:	7 manifests ending in:	817, 819, 820, 823 to 825, & 827
03 January 2019:	5 manifests ending in:	726 to 730
04 January 2019:	7 manifests ending in:	732 to 738

Also attached are laboratory analyses for 24 waste profile samples collected by CHES and analyzed by Specialty Analytical. The file names for the reports list the sample ID number that is also on the corresponding LDR notification form. That is, the three reports have the following sample ID numbers:

LIT-001 to LIT-007
LIT-008 to LIT-023 & Tetra-001
MULT-001-C to MULT-007-C

I still owe you the CHI-prepared haz-cataloguing data sheets for known chemicals in labeled containers, the Tetra Tech-prepared weekly hazardous substances inspection reports, and additional manifests/LDR notification forms as they are made available to Tetra Tech. I will update you tomorrow (Wednesday) on the transmittal status of these additional documents.

Please feel free to call me if there are questions/comments regarding the attached documents.

Ex. 6 PP / Ex. 7(C)

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From: COLLINS Jay <Jay.COLLINS@state.or.us>

Sent: Tuesday, January 8, 2019 9:11 AM

To: [Ex. 6 PP / Ex. 7(C)] COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: [Ex. 6 PP / Ex. 7(C)]
[Ex. 6 PP / Ex. 7(C)] BATES Zebuliah <Zebuliah.Bates@state.or.us>
Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update

Thank you [Ex. 6 PP / Ex. 7(C)]

I appreciate your kind reply. We have a plan.

I've recently adopted a policy of communicating in more direct terms. Everyone is busy these days. With the volume of work currently crossing my desk, I need what I need to keep track.

I look forward to receiving this documentation.

Jay

From: [Ex. 6 PP / Ex. 7(C)]
Sent: Monday, January 7, 2019 3:00 PM
To: COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: [Ex. 6 PP / Ex. 7(C)]
[Ex. 6 PP / Ex. 7(C)] BATES Zebuliah <Zebuliah.Bates@state.or.us>
Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update

Jay: Received. Thank you for your timely reply and reminder of deadlines and requested documents. I misunderstood the need to provide the documents on a daily basis and we have been concentrating on getting the removal activity completed over the two holiday weeks. The misunderstanding/timing of providing the requested documents (or lack thereof) is entirely at my desk.

We note the reminder of the illegal storage of hazardous substances by SoloPower Systems, Inc. The Property Owner and Multnomah County are doing their best to complete the removal and disposal of the hazardous substances in a timely fashion.

Following receipt of your e-mail we have requested that Clean Harbors, Inc. (CHI) confirm that it has provided us with up-to-date copies of the following:

- Hazardous waste manifests,
- LDR forms,
- Documentation of final waste characterization supporting the management options selected. This includes haz-cataloguing and waste profiling documentation.

As soon as we have the above confirmation, either I or [Ex. 6 PP / Ex. 7(C)] of our team will forward the forms/documentation prepared by CHI to date to you. This includes forms/documentation for removal activities that are being undertaken by CHI under contract to Multnomah County and under contract to the Property Owner.

We also are requesting that going forward CHI provide us with the above forms/documentation daily, so we can provide them by the following day to you.

The one remaining requested item is the:

- Weekly inspection logs of containers of hazardous waste. We expect to provide the logs prepared to date by Tetra Tech to you by tomorrow.

Please let me know if I have overlooked a requested item or not responded with timing for transmittal to you.

Ex. 6 PP / Ex. 7(C)

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From: COLLINS Jay <Jay.COLLINS@state.or.us>
Sent: Monday, January 7, 2019 1:49 PM
To: Ex. 6 PP / Ex. 7(C); COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: Ex. 6 PP / Ex. 7(C)
Ex. 6 PP / Ex. 7(C); BATES Zebuliah <Zebuliah.Bates@state.or.us>
Subject: RE: Former SoloPower Facility - Removal of Hazardous Substances - Status Update

Ex. 6 PP / Ex. 7(C) :

DEQ issued a one-time extension thru 1-4-19 for storage of hazardous waste on site. DEQ plans to issue only a warning letter for exceeding this threshold. DEQ has stated its interest in the waste being sent off-site well-characterized and correctly disposed, and we appreciate the property owner hiring professionals to manage and dispose this hazardous waste accordingly. Were the final deadline of 2-4-19 exceeded, DEQ would need to evaluate whether to pursue a penalty in this matter for illegal storage.

I want to be as clear as I can in stating DEQ's needs.

DEQ requested and you agreed to provide hazardous waste manifests and LDR forms EACH AND EVERY DAY hazardous wastes are shipped. DEQ has received NO hazardous waste manifests. DEQ understands shipments have been ongoing since the end of 2018.

You also agreed to provide DEQ with weekly inspection logs of all containers of hazardous waste. DEQ has received NONE of these logs.

DEQ also requested documentation of the waste characterization work performed on site. To date, DEQ has not received documentation of final waste characterization supporting the management options selected.

DEQ expects the property owner to immediately correct these delinquencies.

Jay Collins
Hazardous Waste Inspector
Northwest Region
Oregon DEQ
(503) 229-5008
collins.jay@deq.state.or.us

From: Ex. 6 PP / Ex. 7(C)
Sent: Saturday, January 5, 2019 6:07 PM
To: COLLINS Jay <Jay.COLLINS@state.or.us>
Cc: Ex. 6 PP / Ex. 7(C)

Ex. 6 PP / Ex. 7(C)

Subject: Former SoloPower Facility - Removal of Hazardous Substances - Status Update

Jay: Removal and off-Site disposal of hazardous substances commenced on 31 December 2018, continued through today (except for New Year's day). Removal and off-Site disposal of all of hazardous substances that is not in equipment is expected to be completed next week.

Hazardous substance removal from equipment under a Multnomah County-issued contract has been underway since 19 December 2018 and is expected to continue at least through the end of next week. Hazardous substances that are removed from equipment are being containerized and removed from the Site for off-Site disposal along with the non-equipment hazardous substances.

Haz-cataloguing and waste profiling were performed prior to removal and off-Site disposal of hazardous substances.

Hazardous substances removal is being performed under manifest.

Clean Harbors, Inc. (CHI) is performing all of the above activities on behalf of both the Site Owner and Multnomah County.

Please let us know if there are any questions regarding the status of these activities.

Ex. 6 PP / Ex. 7(C)

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